

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Thomas Dooner	:	Chapter 13
Debtor	:	Case No.: 18-13123

EXPEDITED MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now Thomas Dooner, hereinafter referred to as "Debtor" and moves this Honorable Court to reconsider its October 13, 2016 Order Modifying Section 362 Automatic Stay in case number 16-16432 and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as an emergency Chapter 13 on or about May 9, 2018.
2. The Chapter 13 bankruptcy matter was assigned case number 18-13123.
3. The Debtor's most recent case prior to the May 9, 2018 filing was on September 12, 2016.
4. The September 12, 2016 Chapter 13 filing was assigned case number 16-16432.
5. During the pendency of case number 16-16432 and on September 16, 2016 the Delaware County Tax Claim Bureau filed a Motion for Relief from the automatic stay.
6. The Motion for Relief from the Automatic Stay was not responded to by the Debtor's former counsel.
7. The October 13, 2016 Order states in relevant part that this Order shall be binding in any other case under this Title purporting to affect the Property filed within

two (2) years from the date of this Order...unless the debtor(s) in that subsequent case obtains a further Order of this court, based upon changed circumstances or for good cause shown."

8. The Debtor has a change of circumstances in that he will be commencing employment on Monday May 14, 2018. The Debtor will be earning \$20.00 per hour as a painter.

9. The Debtor is under the belief that a repayment Plan is affordable in that he does not have a mortgage expense attached to the property.

10. Further, the property is valued in excess of \$160,000.00 and therefore substantial equity exists which the Debtor can realize from a Sale Plan in Chapter 13.

11. For the reasons stated herein, The Debtor is desirous of maintaining his interest in the real property known as and located at 400 Essex Avenue, Norwood, PA 19074.

12. There is basis for an expedited hearing in this case because a Tax Sale is scheduled on the subject real property on May 10, 2018 at 9:00 am.

WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Vacate its October 13, 2016 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: May 9, 2018

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
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